

Kara D. Millard

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FOCUS AREAS

Artificial Intelligence and
Machine Learning
Committee on Foreign
Investment in the United
States (CFIUS)
Export Control and
Sanctions
National Security and Trade
Regulatory

EXPERIENCE

Kara Millard is a national security associate in the Washington, D.C., office of Wilson Sonsini Goodrich & Rosati, where she focuses on economic sanctions and export controls, including those administered by the U.S. Department of Commerce's Bureau of Industry and Security (BIS) and the U.S. Department of Treasury's Office of Foreign Assets Control (OFAC). She represents clients in obtaining BIS and OFAC licenses, advises on compliance risks in mergers and acquisitions, and develops compliance programs to assist companies in avoiding sanctions and export control violations. Kara also provides export controls and sanctions compliance advice to clients from a wide range of industries. This work includes identifying proper classifications and license requirements under the US Export Administration Regulations (EAR) and military-specific controls administered under the International Traffic in Arms Regulations (ITAR). Kara supports clients in conducting internal investigations out of concern for potential violations, as well as preparing Voluntary Self-Disclosures (VSDs) and responses to government agencies.

Kara advises U.S. companies and foreign investors in determining whether to make a filing with the Committee on Foreign Investment in the United States (CFIUS), and counsels clients throughout the CFIUS review process, including on risk allocation in transaction documents and negotiation of mitigation measures. She also advises on compliance with emerging U.S. outbound screening requirements, including regulatory obligations under the U.S. Department of Treasury's Outbound Investment Screening Program (OISP). In addition, she assists clients in assessing cross-border transactional risks associated with foreign direct investment (FDI) review regimes globally. Kara is a frequent author of the firm's publications and client outreach regarding changes to the regulations listed above.

While attending law school, Kara served as an international trade policy analyst at the Harrison Institute for Public Law at Georgetown University Law Center, where she developed WTO-compliant legislation drafting guidelines for a U.S. carbon pricing system. She served as senior editor for the *Georgetown Journal of International Law* and represented Georgetown Law as a jurist in the Willem C. Vis International Arbitration Moot Competition in Hong Kong. She also interned for the Honorable Judge Robert N. Scola in the United States District Court for the Southern District of Florida.

In addition to English, Kara speaks fluent French.

CREDENTIALS

Education

- J.D., Georgetown University Law Center
- B.A., Johns Hopkins University

Admissions

- Bar of the District of Columbia
- State Bar of New York

Select Publications

- In addition to the below publications, Kara is a frequent contributor to the firm's quarterly *All Eyes on AI: Regulatory, Litigation, and Transactional Developments* newsletter.
- Co-author, "White House Releases America's AI Action Plan," Wilson Sonsini Alert, July 25, 2025
- Co-author with J. Aiello LeBeau and A. Seymour, "From Embargo to Engagement: U.S. Reopens Doors to Syria," Wilson Sonsini Alert, July 3, 2025
- Co-author with S. Heifetz and J. Gruenspecht, "The CFIUS 'Fast-Track' Pilot Program: Why You (Probably) Can Ignore This Space," Wilson Sonsini Alert, May 28, 2025
- Co-author with J. Aiello LeBeau, J. Gruenspecht, and A. Seymour, "Commerce Proposes New Reporting Requirement for Advanced AI Developers and Cloud Computing Providers," Wilson Sonsini Alert, September 16, 2024
- Co-author, "2023 National Security Regulations Year in Review (Taylor's Version)," Wilson Sonsini Newsletter, April 8, 2024
- Co-author with J. Gruenspecht, "First Proposed Rules Under Biden AI Order Issued as Part of the Larger New Customer Cyberthreat Disclosure Requirements for Cloud Computing Providers," Wilson Sonsini Alert, February 1, 2024
- Co-author with J. Cheng, S. Cowell, N. Goyal, J. Gruenspecht, G. Hendrick, S. McKinney, M. Mithal, and R. Schonwald, "AI in the Biden Administration's Crosshairs—Summarizing the Sweeping New Executive Order and Ten Top Takeaways," Wilson Sonsini Alert, November 2, 2023
- Co-author with J. Aiello LeBeau, B. Poellot, and A. Seymour, "BIS Expands Export Controls on Advanced Computing Integrated Circuits for Supercomputer and Semiconductor End Use, and on Semiconductor Manufacturing Equipment and Related Equipment to China," Wilson Sonsini Alert, October 20, 2023
- Co-author with W. Chen, J. Gruenspecht, S. Heifetz, and B. Poellot, "Biden Unveils Executive Order: Outbound Screening Program Restricting China Investments," Wilson Sonsini Alert, August 14, 2023
- Co-author with J. Aiello LeBeau and S. Patak, "United States Imposes Export Restrictions on Beijing Genomics Institute (BGI) Group Subsidiaries over National Security Concerns," Wilson Sonsini Alert, March 21, 2023
- Co-author with J. Aiello LeBeau and J. Hartwig, "'Disruptive Technology Strike Force' to Target Protection of Sensitive Technologies, Export Controls Circumvention," Wilson Sonsini Alert, February 27, 2023
- Co-author with N. Dhir, J. Gruenspecht, and S. Heifetz, "President Biden's Executive Order on CFIUS Likely to Yield Incremental Tightening," Wilson Sonsini Alert, September 20, 2022
- Co-author with J. Aiello LeBeau and A. Seymour, "New Russia Sanctions Imposed as Ukraine War Continues: Expansion of Controls on EAR99 Items and Military End-Uses," Wilson Sonsini Alert, September 19, 2022
- Co-author with J. Aiello LeBeau and A. Seymour, "Russia Sanctions Update: Intellectual Property General License and a Prohibition on the Provision of Some Services," Wilson Sonsini Alert, May 11, 2022
- Co-author with J. Aiello LeBeau, "New U.S. Sanctions on Russian Banks and Elites, Expanded Export Controls, and Other Updates," Wilson Sonsini Alert, April 11, 2022
- Co-author with J. Aiello LeBeau and A. Seymour, "License Exception ENC Severely Limited for Exports to Russia and Belarus, Belarus Targeted by Biden's Third Tranche of Controls, OFAC Clarifies Earlier Restrictions in Russia-Ukraine Crisis," Wilson Sonsini Alert, March 3, 2022
- Co-author with J. Aiello LeBeau, M. Casey, J. Hartwig, and A. Seymour, "Biden Administration Implements Significant BIS Controls and Imposes Second Tranche of OFAC Sanctions in Russia-Ukraine Crisis," Wilson Sonsini Alert, February 25, 2022
- Co-author with J. Aiello LeBeau, J. Hartwig, and A. Seymour, "Biden Administration Authorizes New Sanctions on Regions of Ukraine," Wilson Sonsini Alert, February 23, 2022
- Co-author with J. Aiello LeBeau, M. Casey, and A. Seymour, "2021 U.S. Sanctions Year in Review," Wilson Sonsini Alert, January 13, 2022
- Co-author with J. Aiello LeBeau, J. Hartwig, and A. Seymour, "Intrusion Preclusion: BIS Issues Long-Awaited Controls on Cybersecurity Items, Creates New License Exception," Wilson Sonsini Alert, October 27, 2021
- Co-author with J. Aiello LeBeau, J. Hartwig, and A. Seymour, "Know Your Customer: OFAC, BIS Penalize Companies for Sales of 'EAR99' Items and Services to Prohibited Parties Through Distributors," Wilson Sonsini Alert, September 21, 2021
- Co-author with J. Aiello LeBeau, J. Hartwig, and A. Seymour, "Electronics Testing Company Penalized \$6.6 Million for Unauthorized Software Exports," Wilson Sonsini Alert, August 19, 2021